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12		Fax: (513) 651-6981
13		Attorneys for Defendant CONCENTRIX SERVICES US, INC.,
14		incorrectly named as CONCENTRIX CORPORATION
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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

JACQLYN KNIGHT, AQUANETTA WRIGHT LAPRINCESS JUNE, ELIZABETH SHUMAN, DENISE JOHNSON, and TAMIKA WHITTEN individually, and on behalf of other similarly-situated individuals.

Plaintiffs,

v.

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CONCENTRIX SERVICES US, INC., a whollyowned subsidiary of SYNNEX CORPORATION,

Defendant,

Case No.: 4:18-cv-07101-KAW

Assigned for all purposes to the Honorable Magistrate Judge Kandis A. Westmore

JOINT MOTION TO APPROVE SETTLEMENT

PLEASE TAKE NOTICE that Named Plaintiffs Jacqlyn Knight and Aquanetta Wright, and the 1,853 other employees who opted-in to the Fair Labor Standards Act ("FLSA") collective action (collectively "Plaintiffs") and Defendant Concentrix Services US, Inc. ("Concentrix" or "Defendant") will move this Court for an Order granting the parties' Joint Motion to Approve Settlement. A motion to approve an FLSA settlement does not require a fairness hearing and the parties have not requested a hearing date.

Plaintiffs worked for Defendant in call centers nationwide. Plaintiffs allege that they performed work without compensation in violation of the FLSA. Defendant denies liability. After four years of litigation, the parties have reached a settlement on behalf of the FLSA Collective, which the parties believe to be fair, adequate, reasonable, and within the range of possible final approval. The parties seek Court approval of their FLSA settlement totaling \$1,550,000.00, including attorneys' fees and costs. *See* Settlement Agreement, attached to the Memorandum in

1	Support as Exhibit A. In support of this Motion, the parties rely on the contemporaneously fried	
2	Memorandum of Law in Support Plaintiffs' Motion to Approve Settlement Agreement and the	
3	supporting documentation filed therewith.	
4	Dated: December 15, 2022	Respectfully Submitted,
5	By: <u>/s/ Neal Shah</u> Neal Shah, Bar NO. 0082672	By: /s/ Jacob R. Rusch Jacob R. Rusch (MN Bar No. 391892)*
6	nshah@fbtlaw.com FROST BROWN TODD LLC	Timothy J. Becker (MN Bar No. 256663)* Zackary S. Kaylor (MN Bar No. 0400854)*
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17	Attorneys for Defendant CONCENTRIX SERVICES US, INC.,	Local Counsel for Plaintiffs
18	incorrectly named as CONCENTRIX CORPORATION	Locui Counsci joi I tuiniyjs
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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2022 a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and copies will be mailed via US Mail to those parties who are not served via the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Jacob R. Rusch